

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

**FINEMAN KREKSTEIN & HARRIS, P.C.**

*A Pennsylvania Professional Corporation*

BY RICHARD J. PERR, ESQUIRE

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**Attorneys for Defendant Penncro Associates, Inc.**

|                           |   |                     |
|---------------------------|---|---------------------|
| ANDY MORAN,               | : |                     |
| Plaintiff                 | : | CIVIL ACTION        |
|                           | : |                     |
| v.                        | : | NO.                 |
|                           | : |                     |
| PENNCRO ASSOCIATES, INC., | : |                     |
| Defendant                 | : | JURY TRIAL DEMANDED |
|                           | : |                     |

**NOTICE OF REMOVAL**

Defendant PENNCRO ASSOCIATES, INC. ("Penncro"), by its undersigned counsel, hereby petitions this Court as follows, pursuant to 28 U.S.C. § 1441(b):

1. Penncro is a defendant in an action pending in the Superior Court of New Jersey, Hudson County, Law Division, Special Civil Part, Docket No. DC-021033-11 ("the State Court Action"). A true and correct copy of the Complaint in the State Court Action is attached hereto as Exhibit "A".

2. Plaintiff in the State Court Action is Andy Moran. See Exhibit "A".

3. Plaintiff's State Court Action alleges violations of the Fair Debt Collection Practices Act, 15 U.S.C. §§ 1692, et seq.

4. The State Court Action involves a question of federal law. Pursuant to 28 U.S.C. § 1441(b), “Any civil action of which the district court shall have original jurisdiction founded on a claim or right arising under . . . the laws of the United States shall be removable.”

5. Since this case arises out of an alleged violation of the Fair Debt Collection Practices Act, 15 U.S.C. §§ 1692, et seq., this Court may properly remove the State Court Action based on 28 U.S.C. § 1441(b).

6. This Notice has been filed with the Court within thirty (30) days after receipt of the Complaint by defendant Penncro.

WHEREFORE, defendant PENNCRO ASSOCIATES, INC., prays that the State Court Action be removed from the Superior Court of New Jersey, Hudson County, Law Division, Special Civil Part, Docket No. DC-021033-11, to this Court for proper and just determination.

FINEMAN KREKSTEIN & HARRIS, P.C.

By /S/ Richard J. Perr  
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Attorneys for Defendant Northland Group, Inc.

Dated: November 15, 2011

## **CERTIFICATE OF SERVICE**

I, RICHARD J. PERR, ESQUIRE, hereby certify that on this date I served a true and correct copy of the foregoing Notice of Removal by first class mail, postage prepaid, on the following:

Yaakov Saks, Esquire  
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/S/ Richard J. Perr

RICHARD J. PERR, ESQUIRE

Dated: November 15, 2011